

EXHIBIT D

USBC/SACRAMENTO/EASTERN DISTRICT OF CA
SACRAMENTO DIVISION

AMERICAN EXPRESS NATIONAL BANK, et al. Plaintiff(s)

v.

WELCOME TRADER'S, a California corporation, et al.

Defendant(s)

CASE NUMBER:
2:24-CV-03320-WBS-SCR

PROOF OF SERVICE
SUMMONS AND COMPLAINT
(Use separate proof of service for each person/party served)

1. At the time of service I was at least 18 years of age and not a party to this action and I **served** copies of the (specify documents):

- a. ☒ Summons ☐ First Amended Complaint ☐ Third Party Complaint
☒ Complaint ☐ Second Amended Complaint ☐ Counter Claim
☐ Alias Summons ☐ Third Amended Complaint ☐ Cross Claim
☒ other (specify): **CIVIL COVER SHEET; STATEMENT OF PUNITIVE DAMAGES**

2. Person served:

- a. ☒ Defendant (name:) **MEHLAB FATIMA, an individual**
b. ☐ Other (specify name and title or relationship to the party/business named):

- c. ☒ Address where the papers were served: **128 Dunfirth Ct
Hayward, CA 945427944**

3. Manner of Service in compliance with (the appropriate box must be checked):

- a. ☒ Federal Rules of Civil Procedure
b. ☐ California Code of Civil Procedure

4. I **served** the person named in Item 2:

- a. ☐ By **Personal Service**. By personally delivering copies. If the person is a minor, by leaving copies with a parent, guardian, conservator or similar fiduciary and to the minor if at least twelve (12) years of age.

1. ☐ Papers were served on (date): at (time):

- b. ☒ By **Substituted Service**. By leaving copies: **"John Doe"(who refused to give name) - Co-Resident**

Age: 40s Weight: 150 Hair: Black Sex: Male
Height: 5'9 Eyes: Race: Middle Eastern Marks:

1. ☒ (home) at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household, at least 18 years of age, who was informed of the general nature of the papers.

2. ☐ (business) or a person apparently in charge of the office, or place of business, at least 18 years of age, who was informed of the general nature of the papers.

3. ☒ Papers were served on (date): **2/6/2025** at (time): **10:55 AM**

4. ☐ by mailing (by first-class mail, postage prepaid) copies to the person served in Item 2(b) at the place where the copies were left in Item 2(c).

5. ☒ papers were mailed on Feb 07, 2025 - DECLARATION OF MAILING ATTACHED

6. ☒ due diligence. I made at least three (3) attempts to personally serve the defendant.

- c. ☐ Mail and acknowledgment of service. By mailing (by first-class mail or airmail, postage prepaid) copies to the person served, with two (2) copies of the form of Waiver of Service of Summons and Complaint and a return envelope, postage prepaid addressed to the sender. (Attach completed Waiver of Service of summons and Complaint).

- d. ☐ **Service on domestic corporation, unincorporated association (including partnership), or public entity. (F.R.Civ.P. 4(h)) (C.C.P. 416.10)** By delivering, during usual business hours, a copy of the summons and complaint to an officer, a managing or general agent, or to any other agent authorized by appointment or by law to receive service of process and, if the agent is one authorized by statute and the statute so requires, by also mailing, by first-class mail, postage prepaid, a copy to the defendant.
- e. ☐ **Substituted service on domestic corporation, unincorporated association (including partnership), or public entity. (C.C.P. 415.20 only)** By leaving during usual business hours, a copy of the summons and complaint in the office of the person served with the person who apparently was in charge and thereafter by mailing (*by first-class mail, postage prepaid*) copies of the persons at the place where the copies were left in full compliance with C.C.P. 415.20. Substitute service upon the California Secretary of State requires a court order. **(Attach a copy of the order to this Proof of Service.)**
- f. ☐ **Service on a foreign corporation.** In any manner prescribed for individuals by FRCP 4(f)
- g. ☐ **Certified or registered mail service.** By mailing to an address outside California (*by first-class mail, postage prepaid, requiring a return receipt*) copies to the person served. **(Attach signed return receipt or other evidence of actual receipt by the person served).**
- h. ☐ **Other** (specify code section and type of service):

5. Service upon the **United States, and Its Agencies, Corporations or Officers.**

- a. ☐ by delivering a copy of the summons and complaint to the clerical employee designated by the U.S. Attorney authorized to accept service, pursuant to the procedures for the Office of the U.S. Attorney for acceptance of service, or by sending a copy of the summons and complaint by registered or certified mail addressed to the civil process clerk at the U.S. Attorneys Office.

Name of person served:


Title of person served:

Date and time of service: (date): at (time):

- b. ☐ By sending a copy of the summons and complaint by registered or certified mail to the Attorney General of the United States at Washington, D.C. **(Attach signed return receipt or other evidence of actual receipt by the person served).**
- c. ☐ By sending a copy of the summons and complaint by registered or certified mail to the officer, agency or corporation **(Attach signed return receipt or other evidence of actual receipt by the person served).**

6. At the time of service I was at least 18 years of age and not a party to this action.

7. Person serving (name, address and telephone number):

 **Uriel Carmona**
Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015
(213) 249-9999

a. Fee for service: \$ **851.40**


- b. ☐ Not a registered California process server
- c. ☐ Exempt from registration under B&P 22350(b)
- d. ☒ Registered California process server
 Registration # : **464**
 County: **San Mateo**

8. ☐ I am a California sheriff, marshal, or constable and I certify that the foregoing is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Date: **February 7, 2025**

Uriel Carmona
 Type or Print Server's Name


 (Signature)

PROOF OF SERVICE - SUMMONS AND COMPLAINT

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Stephen J. Newman SBN: 181570 STEPTOE LLP 2029 Century Park East 980 Los Angeles, CA 90067 TELEPHONE NO.: FAX NO. E-MAIL ADDRESS snewan@steptoe.com ATTORNEY FOR (Name): Plaintiff: AMERICAN EXPRESS NATIONAL BANK, et al.	FOR COURT USE ONLY Case 2:24-cv-03320-WBS-SCR Document 95 Filed 02/10/25 Page 3 of 89
USBC/SACRAMENTO/EASTERN DISTRICT OF CA STREET ADDRESS: 501 I ST., MAILING ADDRESS: CITY AND ZIP CODE: SACRAMENTO, CA 95814-2322 BRANCH NAME: SACRAMENTO DIVISION	
PLAINTIFF/PETITIONER: AMERICAN EXPRESS NATIONAL BANK, et al. DEFENDANT/RESPONDENT: WELCOME TRADER'S, a California corporation, et al.	CASE NUMBER: 2:24-CV-03320-WBS-SCR
DECLARATION OF DILIGENCE	Ref. No. or File No.: 125335.00459

I, Vihn Chu, declare: I am a Registered Process Server and was retained to serve process in the above-referenced matter on the following person or entity: MEHLAB FATIMA, an individual as follows:

Documents:

Summons; Complaint; CIVIL COVER SHEET; STATEMENT OF PUNITIVE DAMAGES

I attempted personal service on the following dates and times with the following results:

Date	Time	Location	Results
1/22/2025	10:13 AM	Business	Per staff, company and individuals are unknown. Bad address. 987 San Pablo Ave, Albany, CA 947062009

Fee for Service: **\$ 851.40**

County:

Registration No.:

Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015
(213) 249-9999



I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 7, 2025.

Signature: _____

Vihn Chu

Vihn Chu

AFFIDAVIT OF REASONABLE DILIGENCE

Order#: LA605507C

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Stephen J. Newman SBN: 181570 STEPTOE LLP 2029 Century Park East 980 Los Angeles, CA 90067 TELEPHONE NO.: FAX NO. E-MAIL ADDRESS sneman@steptoe.com ATTORNEY FOR (Name): Plaintiff: AMERICAN EXPRESS NATIONAL BANK, et al.	FOR COURT USE ONLY Case 2:24-cv-03320-WBS-SCR Document 95 Filed 02/10/25 Page 45 of 89
USBC/SACRAMENTO/EASTERN DISTRICT OF CA STREET ADDRESS: 501 I ST., MAILING ADDRESS: CITY AND ZIP CODE: SACRAMENTO, CA 95814-2322 BRANCH NAME: SACRAMENTO DIVISION	
PLAINTIFF/PETITIONER: AMERICAN EXPRESS NATIONAL BANK, et al. DEFENDANT/RESPONDENT: WELCOME TRADER'S, a California corporation, et al.	CASE NUMBER: 2:24-CV-03320-WBS-SCR
DECLARATION OF DILIGENCE	Ref. No. or File No.: 125335.00459

I, Uriel Carmona, declare: I am a Registered Process Server and was retained to serve process in the above-referenced matter on the following person or entity: MEHLAB FATIMA, an individual as follows:

Documents:

Summons; Complaint; CIVIL COVER SHEET; STATEMENT OF PUNITIVE DAMAGES

I attempted personal service on the following dates and times with the following results:

Date	Time	Location	Results
2/4/2025	8:58 PM	Home	No answer. 2 cars in driveway. Lights on. 128 Dunfirth Ct, Hayward, CA 945427944
2/5/2025	7:28 AM	Home	I was able to speak with Sarib and he stated that the subject was not available at the time. No further information. 128 Dunfirth Ct, Hayward, CA 945427944

Fee for Service: **\$ 851.40**

County: **San Mateo**

Registration No.: **464**

Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015
(213) 249-9999



I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 7, 2025.

Signature: _____

Uriel Carmona

Uriel Carmona

AFFIDAVIT OF REASONABLE DILIGENCE

Order#: LA605507C

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Stephen J. Newman SBN: 181570 STEPTOE LLP Case 2:24-cv-03320-WBS-SCR Document 95 Filed 02/10/25 Page 56 of 89 2029 Century Park East 980 Los Angeles, CA 90067 TELEPHONE NO.: FAX NO. E-MAIL ADDRESS snewan@steptoe.com ATTORNEY FOR (Name): Plaintiff: AMERICAN EXPRESS NATIONAL BANK, et al.		FOR COURT USE ONLY	
USBC/SACRAMENTO/EASTERN DISTRICT OF CA STREET ADDRESS: 501 I ST., MAILING ADDRESS: CITY AND ZIP CODE: SACRAMENTO, CA 95814-2322 BRANCH NAME: SACRAMENTO DIVISION			
PLAINTIFF/PETITIONER: AMERICAN EXPRESS NATIONAL BANK, et al. DEFENDANT/RESPONDENT: WELCOME TRADER'S, a California corporation, et al.		CASE NUMBER: 2:24-CV-03320-WBS-SCR	
DECLARATION OF DILIGENCE		Ref. No. or File No.: 125335.00459	

I, Robert Rubio , declare: I am a Registered Process Server and was retained to serve process in the above-referenced matter on the following person or entity: MEHLAB FATIMA, an individual as follows:

Documents:

Summons; Complaint; CIVIL COVER SHEET; STATEMENT OF PUNITIVE DAMAGES

I attempted personal service on the following dates and times with the following results:

Date	Time	Location	Results
1/24/2025	7:47 AM	Home	No answer. No cars. I can't see into home. All blinds closed. Neighbor across the street said he didn't know the people there by name, but doesn't think it's the person I'm looking for. He thinks the people that live there are Caucasian but not exactly sure. 4320 Ardwell Way, Sacramento, CA 958235043
1/24/2025	8:21 AM	Business	This address is Blue Diamond Growers. Per security guard at gate, who said he didn't think that company was there or associated with Blue Diamond but tried calling legal and there was no answer. He said sometimes they get there after 10am. 1802 C St, Sacramento, CA 958111010
1/24/2025	10:54 AM	Business	Came back spoke to Chris again at security gate. He tried calling legal and took about 10 min. He finally got a hold of someone. They said there is no other company there other than Blue Diamond. They don't know the name Sarib Rehman or Mehlab Fatima. Bad address. 1802 C St, Sacramento, CA 958111010
1/25/2025	10:08 AM	Home	No answer. No cars. No changes. No answer at other neighbors. 4320 Ardwell Way, Sacramento, CA 958235043
1/26/2025	8:17 PM	Home	No answer. No cars. No lights on inside or outside. No visible changes. No answer at neighbors. 4320 Ardwell Way, Sacramento, CA 958235043

Continued on Next Page

Fee for Service: **\$ 851.40**

County: **Sacramento**

Registration No.: **2010-28**

Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015
(213) 249-9999



I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 7, 2025.

Signature: _____

Robert Rubio

AFFIDAVIT OF REASONABLE DILIGENCE

Order#: LA605507C

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address)</p> <p>Stephen J. Newman SBN: 181570 STEPTOE LLP 2029 Century Park East 980 Los Angeles, CA 90067</p> <p>TELEPHONE NO.: FAX NO. E-MAIL ADDRESS snewan@steptoe.com ATTORNEY FOR (Name): Plaintiff: AMERICAN EXPRESS NATIONAL BANK, et al.</p>		<p>FOR COURT USE ONLY</p> <p>Case 2:24-cv-03320-WBS-SCR Document 95 Filed 02/10/25 Page 67 of 89</p>	
<p>USBC/SACRAMENTO/EASTERN DISTRICT OF CA</p> <p>STREET ADDRESS: 501 I ST.,</p> <p>MAILING ADDRESS:</p> <p>CITY AND ZIP CODE: SACRAMENTO, CA 95814-2322</p> <p>BRANCH NAME: SACRAMENTO DIVISION</p>			
<p>PLAINTIFF/PETITIONER: AMERICAN EXPRESS NATIONAL BANK, et al.</p> <p>DEFENDANT/RESPONDENT: WELCOME TRADER'S, a California corporation, et al.</p>		<p>CASE NUMBER:</p> <p>2:24-CV-03320-WBS-SCR</p>	
<p>DECLARATION OF DILIGENCE</p>		<p>Ref. No. or File No.: 125335.00459</p>	

I, Robert Rubio , declare: I am a Registered Process Server and was retained to serve process in the above-referenced matter on the following person or entity: MEHLAB FATIMA, an individual as follows:

Summons; Complaint; CIVIL COVER SHEET; STATEMENT OF PUNITIVE DAMAGES

Date	Time	Location	Results
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Fee for Service: \$ 851.40

Registration No.: **2010-28**



Signature: _____

AFFIDAVIT OF REASONABLE DILIGENCE

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Stephen J. Newman SBN: 181570 STEPTOE LLP 2029 Century Park East 980 Los Angeles, CA 90067 TELEPHONE NO.: FAX NO. E-MAIL ADDRESS snewan@steptoe.com ATTORNEY FOR (Name): Plaintiff: AMERICAN EXPRESS NATIONAL BANK, et al.	FOR COURT USE ONLY Case 2:24-cv-03320-WBS-SCR Document 95 Filed 02/10/25 Page 7 of 89
USBC/SACRAMENTO/EASTERN DISTRICT OF CA STREET ADDRESS: 501 I ST., MAILING ADDRESS: CITY AND ZIP CODE: SACRAMENTO, CA 95814-2322 BRANCH NAME: SACRAMENTO DIVISION	
PLAINTIFF/PETITIONER: AMERICAN EXPRESS NATIONAL BANK, et al. DEFENDANT/RESPONDENT: WELCOME TRADER'S, a California corporation, et al.	CASE NUMBER: 2:24-CV-03320-WBS-SCR
DECLARATION OF DILIGENCE	Ref. No. or File No.: 125335.00459

I, Uriel Carmona , declare: I am a Registered Process Server and was retained to serve process in the above-referenced matter on the following person or entity: MEHLAB FATIMA, an individual as follows:

Documents:

Summons; Complaint; CIVIL COVER SHEET; STATEMENT OF PUNITIVE DAMAGES

I attempted personal service on the following dates and times with the following results:

Date	Time	Location	Results
2/6/2025	10:55 AM	Home	Substituted service on: MEHLAB FATIMA, an individual; 128 Dunfirth Ct, Hayward, CA 94542-7944; by serving: "John Doe"(who refused to give name) - Co-Resident, Middle Eastern Male 40s 150 Black 5'9 .

Fee for Service: **\$ 851.40**

County: **San Mateo**

Registration No.:

Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015
(213) 249-9999



I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 7, 2025.

Signature: _____

Uriel Carmona

Uriel Carmona

AFFIDAVIT OF REASONABLE DILIGENCE

Order#: LA605507C

Attorney or Party without Attorney:

Stephen J. Newman, SBN: 181570

STEPTOE LLP

2029 Century Park East 980

Los Angeles, CA 90067

TELEPHONE No.:

E-MAIL ADDRESS (Optional): snewman@steptoe.com

FAX No. (Optional):

Attorney for: Plaintiff AMERICAN EXPRESS NATIONAL BANK, et al.

Ref No. or File No.:

125335.00459

Insert name of Court, and Judicial District and Branch Court:

USBC/SACRAMENTO/EASTERN DISTRICT OF CA - SACRAMENTO DIVISION

Petitioner: AMERICAN EXPRESS NATIONAL BANK, et al.

Respondent: WELCOME TRADER'S, a California corporation, et al.

FOR COURT USE ONLY

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**PROOF OF SERVICE
BY MAIL**

HEARING DATE:

TIME:

DEPT.:

CASE NUMBER:

2:24-CV-03320-WBS-SCR

1. I am over the age of 18 and not a party to this action. I am employed in the county where the mailing occurred.
2. I served copies of the Summons; Complaint; CIVIL COVER SHEET; STATEMENT OF PUNITIVE DAMAGES
3. By placing a true copy thereof enclosed in a sealed envelope, with First Class postage thereon fully prepaid, in the United States Mail at Los Angeles, California, addressed as follows:

- a. Date of Mailing: February 7, 2025
- b. Place of Mailing: Los Angeles, CA
- c. Addressed as follows: MEHLAB FATIMA, an individual
128 Dunfirth Ct
Hayward, CA 94542-7944

I am readily familiar with the firm's practice for collection and processing of documents for mailing. Under that practice, it would be deposited within the United States Postal Service, on that same day, with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.

Fee for Service: \$ 851.40

Nationwide Legal, LLC REG: 12-234648
1609 James M Wood Blvd.
Los Angeles, CA 90015
(213) 249-9999
www.nationwideasap.com

I declare under penalty of perjury under the laws of the
The United States that the foregoing information
contained in the return of service and statement of
service fees is true and correct and that this declaration
was executed on **February 7, 2025**.

Signature: _____

Crystal Bobadilla

PROOF OF SERVICE BY MAIL

Order#: LA605507C/mailproof